

THE HONORABLE ROBERT J. BRYAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

CAMERON LUNDQUIST and LEEANA LARA,  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

FIRST NATIONAL INSURANCE COMPANY  
OF AMERICA, LM GENERAL INSURANCE  
COMPANY, and CCC INFORMATION  
SERVICES INCORPORATED,

Defendants.

No. 3:18-CV-05301-RJB

STIPULATED MOTION AND  
[PROPOSED] ORDER TO EXTEND  
CASE SCHEDULE

NOTE ON MOTION CALENDAR:  
**OCTOBER 11, 2019**

Pursuant to Local Rule 7(d)(1), Plaintiffs Cameron Lundquist and Leeana Lara, Defendants First National Insurance Company of America, LM General Insurance Company (“Insurer Defendants”), and Defendant CCC Information Services Inc. (“CCC”), collectively the “Parties,” hereby stipulate as follows:

1. The parties have diligently pursued discovery and are in the process of conferring about a number of unresolved discovery requests as well as identifying and producing responsive documents.

2. The complaint was amended on April 26, 2019 to add CCC Information Services Inc. (“CCC”) as a defendant, thereby necessitating further written discovery and depositions. CCC filed its Answer on June 3, 2019.

3. After many weeks of intensive negotiation, Plaintiffs and CCC are also in the process of finalizing a proposed protective order as well as proposed protocols for the production of electronically stored information (ESI). Once those documents are filed, Plaintiffs and CCC expect that substantial completion of production of ESI relating to class certification will take several weeks.

4. Because ESI discovery between Plaintiffs and CCC has only just begun, Plaintiffs and CCC agree that additional time is needed for written discovery and depositions, including the production of electronically stored information noted above.

5. The current case schedule imposes an October 4, 2019 deadline for Plaintiffs to file their Motion for Class Certification. Plaintiffs and CCC agree that more time is needed in order to finalize discovery related class certification issues. While the Insurer Defendants believe Plaintiffs have had more than enough time to take class related discovery from both the Insurer Defendants and CCC in order to file their Motion for Class Certification, the Insurer Defendants do not dispute that CCC was added to the case in the past several months, and as a result, CCC may need more time to prepare its defense to class certification.

Based on the foregoing, the parties stipulate and agree that good cause exists to continue the case schedule as follows:

Plaintiffs' class certification motion and expert disclosures due	Jan. 31, 2020
Disclosure of any non-certification related expert testimony by Plaintiffs under RFCP 26(a)(2) due	April 15, 2020
All motions related to discovery must be filed by	June 15, 2020
Deposition of Plaintiffs' class certification experts to be completed by	March 31, 2020
Defendants' class certification response and expert disclosures due	March 31, 2020
Fact Discovery completed by	July 31, 2020

Deposition of Defendants' class certification experts to be completed by	April 30, 2020
Plaintiffs' reply in support of motion for class certification due	April 30, 2020
Disclosure of any non-certification related expert testimony by Defendants under RFCP 26(a)(2)	June 15, 2020
All dispositive motions must be filed by	Sept. 1, 2020
Mediation per CR 39.1(c)(3) held no later than	Jul. 15, 2020
Expert Discovery completed by	Aug. 3, 2020
Responses to dispositive motions must be filed by	Oct. 1, 2020
Replies in support of dispositive motions must be filed by	Oct. 15, 2020
Letter of Compliance as to CR 39.1 filed by	Jul. 15, 2020
Motions in limine should be filed by	Oct. 30, 2020
Agreed pretrial order lodged with the court by	Oct. 30, 2020
Trial briefs, proposed voir dire and jury instructions due	Oct. 30, 2020
Pretrial Conference will be held at 8:30 a.m. on	Nov. 6, 2020
Trial to begin	Nov. 16, 2020

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED this \_\_\_\_ day of October, 2019.

\_\_\_\_\_  
ROBERT J. BRYAN  
UNITED STATES DISTRICT JUDGE

Dated: October 1, 2019

s/ Steve W. Berman  
Steve W. Berman, WSBA No. 12536

**Hagens Berman Sobol Shapiro LLP**  
1301 2nd Avenue, Suite 2000  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
Email: steve@hbsslaw.com

Robert B. Carey (*pro hac vice*)  
John M. DeStefano (*pro hac vice*)  
**Hagens Berman Sobol Shapiro LLP**  
11 West Jefferson Street, Suite 1000  
Phoenix, AZ 85003  
Telephone: (602) 224-2628  
Email: rob@hbsslaw.com  
johnd@hbsslaw.com

Marc A. Goldich (*pro hac vice*)  
**Axler Goldich LLC**  
1520 Locust Street, Suite 301  
Philadelphia, Pennsylvania 19102  
Telephone: (267) 534-7400  
Email: mgoldich@axgolaw.com

David Woloshin (*pro hac vice*)  
Dina Ronsayro (*pro hac vice*)  
**Astor Weiss Kaplan & Mandel LLP**  
200 South Broad Street, Suite 600  
Philadelphia, PA 19102  
Telephone: (215) 790-0100  
dwoloshin@astorweiss.com  
dronsayro@astorweiss.com

*Attorneys for Plaintiffs*

Respectfully submitted,

s/ Kathleen M. O'Sullivan  
Kathleen M. O'Sullivan, WSBA No. 27850

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101  
Telephone: (206) 359-8000  
Facsimile: (206) 359-9000  
Email: kosullivan@perkinscoie.com

Kathleen P. Lally (*pro hac vice*)  
**Latham & Watkins LLP**  
330 North Wabash Avenue, Suite 2800  
Chicago, IL 60611  
Telephone: (312) 876-7700  
Facsimile: (312) 993-9767  
Email: kathleen.lally@lw.com

Marguerite M. Sullivan (*pro hac vice*)  
Jason R. Burt (*pro hac vice*)  
**Latham & Watkins LLP**  
555 Eleventh Street, NW, Suite 1000  
Washington, D.C. 20004  
Telephone: (202) 637-2200  
Facsimile: (202) 637-2200  
Email: marguerite.sullivan@lw.com  
jason.burt@lw.com

Steven J. Pacini (*pro hac vice*)  
**Latham & Watkins LLP**  
200 Clarendon Street, 27<sup>th</sup> Floor  
Boston, MA 02116  
Telephone: (617) 880-4516  
Facsimile: (617) 948-6001  
Email: steven.pacini@lw.com

*Attorneys for Defendant CCC Information Services Inc.*

s/ John M. Silk  
John M. Silk, WSBA No. 52989  
**Wilson Smith Cochran Dickerson**  
901 Fifth Ave., Suite 1700  
Seattle, WA 98164  
Telephone: (206) 623-4100  
Facsimile: (206) 623-9273  
Email: silk@wscd.com

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James A. Morsch (*pro hac vice*)  
Casey T. Grabenstein, (*pro hac vice*)  
Kellie Y. Chen (*pro hac vice*)  
**Saul Ewing Arnstein & Lehr**  
161 N. Clark Street, Suite 4200  
Chicago, IL 60654  
Telephone: (312) 876-7100  
Facsimile: (312) 876-0288  
Email: jim.morsch@saull.com  
casey.grabenstein@saull.com  
kellie.chen@saull.com  
  
*Attorneys for Defendants First National  
Insurance Company of America and LM  
General Insurance Company*

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on October 1, 2019 a true and correct copy of the foregoing was filed electronically by CM/ECF, which caused notice to be sent to all counsel of record.

DATED this 1st day of October, 2019.

s/ Steve W. Berman  
Steve W. Berman, WSBA No. 12536